

EXHIBIT F

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December 12, 2007

VIA CERTIFIED MAIL

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Cambridge, MA 02142

RE: MDL No. 1629; *In Re: Neurontin Marketing, Sales Practices and Products Liability Litigation*; In the U.S. District Court for the District of Massachusetts.

This document relates to:

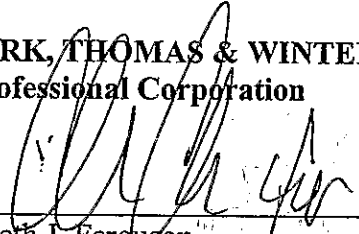
RUTH SMITH, Individually and as Widow for the use and benefit of herself and the next of kin of Richard Smith, Deceased.

Dear Counsel:

Enclosed is Defendants' Supplemental Disclosure Statement.

Sincerely,

CLARK, THOMAS & WINTERS
A Professional Corporation



Kenneth J. Ferguson
Attorney for Pfizer Inc

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	:	MDL Docket No. 1629
	:	
	:	Master File No. 04-10981
	:	
THIS DOCUMENT RELATES TO:	:	Judge Patti B. Saris
	:	
SMITH v. PFIZER, INC., et al.	:	Magistrate Judge Leo T.
05-CV-11515-PBS	:	Sorokin
	:	

DEFENDANTS' SUPPLEMENTAL DISCLOSURE STATEMENT

PLEASE TAKE NOTICE, that pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants Pfizer Inc., Parke-Davis, a division of Warner-Lambert Company and Warner-Lambert Company LLC, Warner-Lambert Company, and Warner Lambert Company LLC ("Defendants") make and supplement their disclosures as follows.

These responses are made subject to all objections as to competence, materiality, relevance, or other objections as to admissibility that may apply in the event that any such response, or the information contained in it, is sought to be used in court. Defendants expressly reserve all such objections.

- A. **Rule 26(a)(1)(A): The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

Discovery and investigation in these actions are on-going. Based on the information reasonably available, Defendants are unable at the present time to identify each and every individual who would have discoverable information that the Defendants may use to support their claims or defenses in the case, and the subjects of such information. Defendants reserve the right to

supplement these disclosures as they become aware of additional individuals who have such information.

Subject to the foregoing and without waiver of any of Defendants' rights, the following individuals may have information that Defendants may use to support their claims and defenses in this action:

A1. Plaintiff:

Ruth Smith, Individually and as Widow for the Use and Benefit of Herself and the Next of Kin of Richard Smith, Deceased.

A2. Members of Plaintiff's and decedent's family:

Wes Carnahan
Drew Charlton
Buford Hoskins
Sherri Hoskins
Gayle Lawson
Gene Lawson
Cindy Smith-Charlton

A3. Health care providers and treating physicians and psychiatrists, including those who prescribed Neurontin to Plaintiff's decedent:

James Robert Cato, M.D.
Heritage Medical Associates
2325 Crestmoor Road
Nashville, TN 37215
615.324.2158

Carl R. Hampf, M.D.
Neurological Surgeons, P.C.
2410 Patterson Street, Suite 500
Nashville, TN 37203
AND
2011 Murphy Avenue, Suite 401
Baptist Tower North
Nashville, TN 37203
615.327.9545

Pam Krancer, R.N., C.S., C.N.R.N.
Neurological Associates
Centennial Professional Plaza
345 23rd Avenue North, Suite 320
Nashville, TN 37203

Edward S. Mackey, M.D.
Tennessee Orthopaedic Alliance
Suite 1000, St. Thomas Medical Plaza East
4230 Harding Road
Nashville, TN 37205

Paul R. McCombs, III, M.D.
Howell Allen Clinic
2011 Murphy Avenue, Suite 401
Baptist Tower North
Nashville, TN 37203
615.327.9545

Stewart Stowers, M.D.
Tennessee Orthopaedic Alliance
301 21st Avenue North
Nashville, TN 37203
615.329.6600

Christopher L. Wood, D.D.S.
1502 17th Avenue South
Nashville, TN 37212
615.463.7884

A4. Hospital, police, medical examiner, and emergency personnel who investigated the incident:

Dr. Feng Li
Assistant Medical Examiner
FORENSIC MEDICAL
850 R S Gass Blvd.
Nashville, TN 37216
615.743.1800
615.743.1890 - Fax

Gary Biggs
Investigator
FORENSIC MEDICAL
850 R S Gass Blvd.
Nashville, TN 37216

615.743.1800
615.743.1890 - Fax

Det. Danny Satterfield
NASHVILLE POLICE DEPARTMENT - NORTH PRECINCT
2231 26th Avenue North
Nashville, TN 37208
615.862.4410

David Nelson Crowder
Retired
3008 Palomino Pl
Hermitage, TN 37076-3900
615.872.7070

- A5. Pfizer employees and representatives who had any communications relating to Neurontin with, or were otherwise in contact relating to Neurontin with, the physician(s) who prescribed Neurontin to Plaintiff's decedent;

Ashley Pippin Moreland
Jacksonville, Florida

- A6. Defendants' employees and representatives with knowledge of the safety of Neurontin including those listed in Defendants' previous disclosures.
- A7. Any witnesses necessary to authenticate documents:

Custodian of Records for
James Robert Cato, M.D.
Heritage Medical Associates
2325 Crestmoor Road
Nashville, TN 37215
615.324.2158

Custodian of Records for
Carl R. Hampf, M.D.
Neurological Surgeons, P.C.
2410 Patterson Street, Suite 500
Nashville, TN 37203

AND
2011 Murphy Avenue, Suite 401
Baptist Tower North
Nashville, TN 37203
615.327.9545

Custodian of Records for
Pam Krancer, R.N., C.S., C.N.R.N.
Neurological Associates
Centennial Professional Plaza
345 23rd Avenue North, Suite 320
Nashville, TN 37203

Custodian of Records for
Edward S. Mackey, M.D.
Tennessee Orthopaedic Alliance
Suite 1000, St. Thomas Medical Plaza East
4230 Harding Road
Nashville, TN 37205

Custodian of Records for
Paul R. McCombs, III, M.D.
Howell Allen Clinic
2011 Murphy Avenue, Suite 401
Baptist Tower North
Nashville, TN 37203
615.327.9545

Custodian of Records for
Stewart Stowers, M.D.
Tennessee Orthopaedic Alliance
301 21st Avenue North
Nashville, TN 37203
615.329.6600

Custodian of Records for
Christopher L. Wood, D.D.S.
1502 17th Avenue South
Nashville, TN 37212
615.463.7884

Custodian of Records for
Emergency Communication Center
2060 15th Avenue South
Nashville, TN 37212

Custodian of Records for
Forensic Medical
850 R S Gass Blvd.
Nashville, TN 37216
615.743.1800
615.743.1890 - Fax

Custodian of Records for
Nashville Police Department
2231 26th Avenue North
Nashville, TN 37208
615.862.4410

A8. Any witnesses identified or disclosed by Plaintiffs.

To the extent any additional discovery and investigation provide additional facts and legal contentions that may substantially alter these disclosures, Defendants reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with those developments, including product identification, identifying other relevant witnesses and additional areas of information which support Defendants' defenses in this case and identifying additional individuals with discoverable information that may be used to support their claims or defenses in this case.

B. Rule 26(a)(1)(B): A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Because discovery and investigation in these actions are ongoing, and because in many instances, Defendants are unable at the present time, based on information reasonably available, to identify all documents, compilations, and tangible things, if any, that Defendants may use to support claims or defenses in these cases and the subject of such information.

Subject to the foregoing and without waiving any of Defendants' rights, Defendants submit the following list:

- B1. Medical records in the possession or control of Plaintiff, Plaintiff's attorneys or health care provider (see below).
- B2. The applicable package insert for the drug manufactured by Defendants at issue in this case.

- B3. Relevant documents contained in regulatory files, including the New Drug Application and Investigational New Drug Application, including documents listed in Defendants' previous disclosures.
- B4. Relevant documents contained in safety surveillance and analysis files, including documents listed in Defendants' previous disclosures.

In addition to the above listed categories, the following documents may be used to support Defendants' claims or defenses:

- 1. Action Quick Corporation
Medical and Billing Records
- 2. Associated Urologists of Nashville
Certifications of No Medical and Billing Records
- 3. Baptist Hospital Medical Records
Pathology Slides/Blocks
- 4. Berklacich, Frank M. MD
Medical and Billing Records
- 5. Blue Cross and Blue Shield of Tennessee
Insurance Records
- 6. Cardiology Group of Middle Tennessee
Medical Records
- 7. Centennial Medical Center
Medical and Billing Records
- 8. Centers for Medicare and Medicaid Services
Claims Records
- 9. Church of Christ At Trinity Lane
Certification of No Records
- 10. Colon & Rectal Surgery Associates
Medical Records and Certification of No Billing Records
- 11. Crawford, Myles A. DC / Powers Chiropractic Clinic
Medical Records
- 12. CVS Privacy Office
Certification of No Records

13. Death Certificate
14. Dyer, David N. MD
Certifications of No Medical and Billing Records
15. Eckerd Drugs
Pharmacy Records
16. Elite Sports Med & Orthopedic Center
Certifications of No Medical and Billing Records
17. Forensic Medical
Medical Examiner Records and Photos
18. Gilroy Church of Christ
Certification of No Records
19. Hampf, Carl MD
Medical and Billing Records
20. Harwell, William B., Jr. MD
Medical and Billing Records
21. Health Insurance Information
Insurance Cards
22. Heart & Vascular Clinic
Medical and Billing Records
23. Heritage Medical Associates
Medical and Billing Records
24. Jackson Park Church of Christ
Certification of No Records
25. Loden Vision Center
Medical and Billing Records
26. Metropolitan Nashville Police Department
Incident Report and Supplements
27. Midstate Cardiology
Certification of No Records
28. Mohs Micrographic Surgery An Dermatology
Medical Records

29. Nashville Internal Medicine Associates
Certifications of No Medical, Billing or Insurance Records
30. Nashville Office Machines
Employment Records
31. Nashville Orthopaedic Associates
Medical Records
32. National Health Laboratories
Lab Reports
33. Neurological Surgeons
Medical and Billing Records
34. Neurosurgical Associates
Medical and Billing Records
35. Otolaryngology Associates of Tennessee
Medical and Billing Records and Certification of Destroyed Records
36. Outpatient Diagnostic Center
Medical Records
37. Plaintiff's Response to Defendant's First Request for Production of Documents and
Things - 08/21/06
38. Plaintiff's Response to Defendants First Set of Interrogatories
02/16/07
39. Plaintiff's Response to Defendants First Set of Interrogatories - 08/21/06
40. Plaintiff's Rule 26(a)(1) Disclosures - 07/24/06
41. Plaintiff's Supplemental Rule 26(a)(1) Disclosures - 08/21/06
42. Plaintiff's Supplemental Rule 26(a)(1) Disclosures - 10/09/07
43. Premier Orthopedics and Sports Medicine
Medical Records
44. Premier Radiology
Medical Records
45. Income Tax Records

46. Emergency Communications Center
Recording of 911 calls
47. Rite Aid Corporation
Certification of No Pharmacy Records
48. Saint Thomas Hospital
Medical Records
49. Schull, David M. M.D.
Certifications of No Medical, Billing and Insurance Records
50. Southern Sports Medicine
Certifications of No Medical and Billing Records
51. Spalding & Nesbitt Urology Clinic
Medical and Billing Records
52. Specialized Assays
Medical Records
53. Sports Medicine Center
Certifications of No Medical and Billing Records
54. Stasko, Dr. Thomas
Medical Records
55. Suicide Note
56. Tennessee Orthopaedic Alliance
Medical Records
57. University Medical Center
Medical Records and Certification of No Pathology Records
58. Urology Associates
Medical Records and Certification of No Billing Records
59. Vanderbilt Patient Accounting
Billing Records
60. Vanderbilt University Medical Center
Medical Records
61. W-2 Forms

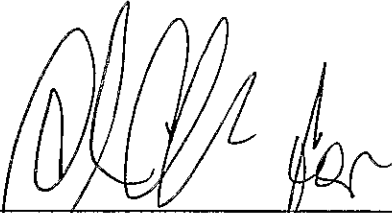
62. Willowbrook Home Care Agencies
Medical Records
63. Willowbrook Home Health Care
Letter re No Records
64. Wood, Christopher L. D.D.S.
Dental Records and Dr. Wood's letter dated 05/19/04
65. Notes of Richard Smith which were added to certain medical records.

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Defendants reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with these developments, including identifying additional areas of information, relevant documents, and tangible things that support their claims or defenses in this case.

Pursuant to Fed. R. Civ. P. 26(b)(5), Defendants object to disclosure or production of documents and materials generated during the course of this litigation that constitute attorney work product or that contain privileged attorney-client communications. These documents and materials may consist, among others, of communications or correspondence between counsel and Defendants, correspondence between counsel and consulting experts, and between Defendants and employees to facilitate the rendering of legal advice. These documents may be exempt from discovery pursuant to Fed. R. Civ. P. 26(b)(3), 26(b)(4)(B), and/or the applicable attorney-client and/or joint defense privilege.

Moreover, if Defendants identify certain documents that they believe contain trade secrets and other confidential research, development, or commercial information, such documents will be produced subject to an appropriate protective order.

Dated: December 12, 2007



KENNETH J. FERGUSON

One of the Attorneys for
Defendant Pfizer Inc.

OF COUNSEL:

Kenneth J. Ferguson

Cedric E. Evans

Jeffrey R. Lilly

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HARE & CHAFFIN

160 Federal Street

Boston, Massachusetts 02110

(617) 330-5000

*Defendants Pfizer Inc., Parke-Davis, a
division of Warner-Lambert Company and
Warner-Lambert Company LLC, Warner-
Lambert Company, and Warner Lambert
Company LLC*

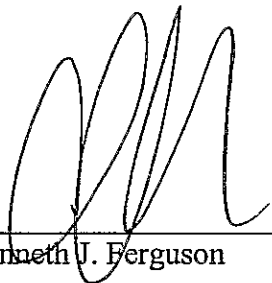
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendants' Supplemental Disclosure Statement was served on December 12, 2007, via certified mail, upon:

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3701 Bee Caves Road
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Austin, TX 78746

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